



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 10 2011

REPLY TO THE ATTENTION OF:

Andrew Stewart
Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Stewart:

The U.S. Environmental Protection Agency reviewed the proposed preconstruction minor New Source Review / Title V permit for Oneida Energy, Inc., located in Green Bay, Wisconsin. Our comments are as follows:

- 1) Condition I.A.1., for the Retort Ovens, establishes a particulate matter (PM) limit. The limit is required in order to comply with PM SIP limits and will restrict emissions in order to comply with ambient air quality standards. Condition I.A.1. fails to specify appropriate compliance test requirements to assure compliance with the applicable limits.

It appears that the requirements of the New Source Performance Standards (NSPS) Subpart AAAAA require an initial stack test (as well as annual stack tests thereafter) to verify that the source will continue to comply with the limits. However, it is not yet known (as a result of the pending applicability determination by EPA) whether the standard will ultimately apply. The permit relies on the use of natural gas and syngas to determine compliance with the applicable PM limits. If NSPS Subpart AAAAA is deemed not to be applicable, the permit will fail to provide for adequate compliance demonstration and monitoring methods since condition I.A.1. does not contain specific monitoring requirements. The preliminary determination uses emission factors (for natural gas and syngas) that are used to estimate PM emissions which are identical to the applicable limits established in the permit. Therefore, it is not clear that the simple use of natural gas and syngas will be sufficient to demonstrate compliance with the applicable limits. Please explain.

- 2) Similar to the concerns raised above, condition I.A.2. appears to lack appropriate requirements for an initial compliance test and periodic monitoring for compliance with the carbon monoxide (CO) limits. Please explain.

- 3) Similar to the concerns raised above, condition I.B.1. appears to lack appropriate requirements for an initial compliance test and subsequent periodic monitoring. As was previously discussed the applicable limits have been set to the equivalent emission rates used to determine PM emissions from the Reciprocating Internal Combustion Engines. It is not clear that the simple use of syngas will assure compliance with the applicable PM limits.
- 4) The monitoring used for PM in condition I.C.1 for the Cooling Towers include the facility determining/recording the total dissolved solids (TDS) and the cooling water conductivity. It is not clear how monitoring these parameters will assure compliance with the applicable PM limits. Additionally, the permit condition does not contain a requirement for an initial stack test. According to the calculation done on page 9 of the preliminary determination, the necessary parameters needed include the water usage rate, the actual drift rate, and the TDS concentration. Please explain how the monitoring scheme will assure compliance with the applicable PM limits.
- 5) Please explain how the monitoring schemes in the permit will assure compliance with the applicable PM and CO limits for the Flare in conditions I.D.

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Blakley".

Pamela Blakley
Chief
Air Permits Section